

**EXHIBIT A**

Index of Annexes

<u>Annex 1</u> .....	Ballot of General Unsecured Claims against Novation and NovaStar Mortgage
<u>Annex 2</u> .....	Ballot of RMBS Litigation Claims against Novation and NovaStar Mortgage
<u>Annex 3</u> .....	Letter to Voting Classes
<u>Annex 4</u> .....	Notice of Non-Voting Status
<u>Annex 5</u> .....	Confirmation Hearing Notice

**ANNEX 1**

**Classes 3a and 3b – Ballot of General Unsecured Claims  
Against Novation and NovaStar Mortgage**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(BALTIMORE DIVISION)**

In re:	*	Chapter 11
<b>NOVATION COMPANIES, INC., et al.,<sup>1</sup></b>	*	Case No. 16-19745, 16-19747-49 (DER)
	*	(Jointly Administered)
	*	
Debtors.		
*   *   *   *   *   *   *   *   *   *   *		

## **Class 3a & 3b Ballot for Accepting or Rejecting Plan of Reorganization**

---

The above captioned debtors and debtors in possession (the “Debtors”) filed a plan of reorganization dated February 14, 2017 (the *Plan*) for the Debtors in these cases. The Court has approved a disclosure statement with respect to the Plan (the *Disclosure Statement*). The Disclosure Statement provides information to assist you in deciding how to vote your ballot. If you do not have a Disclosure Statement, you may obtain a copy by writing Novation Companies, Inc., et al., c/o Shapiro Sher Guinot & Sandler, Attn: Joel I. Sher, 250 West Pratt Street, Suite 2000, Baltimore, Maryland 21201 or by email at jis@shapirosher.com, or by calling 410-385-4277 (the “Solicitation Agent”).

Court approval of the disclosure statement does not indicate approval of the Plan by the Court.

**You should review the Disclosure Statement and the Plan before you vote. You may wish to seek legal advice concerning the Plan and your classification and treatment under the Plan. Your claim has been placed in either Class 3a or 3b under the Plan. If you hold claims or equity interests in more than one class, you will receive a ballot for each class in which you are entitled to vote.**

**If your ballot is not received on or before [ ], 2017, by the Solicitation Agent at the address at the bottom of this Notice, and such deadline is not extended, your vote will not count as either an acceptance or rejection of the Plan.**

**If the Plan is confirmed by the Bankruptcy Court, it will be binding on you whether or not you vote.**

---

<sup>1</sup> The Debtors in these chapter 11 cases are: (i) Novation Companies, Inc. f/k/a NovaStar Financial, Inc., (ii) NovaStar Mortgage LLC f/k/a NovaStar Mortgage, Inc., (iii) NovaStar Mortgage Funding Corporation and (iv) 2114 Central, LLC f/k/a Advent Financial Services, LLC.

### Acceptance or Rejection of the Plan

The undersigned, the holder of a Class 3 claim against the Debtor

*Check one box only*

- ☐ Novation Companies, Inc.
- ☐ NovaStar Mortgage Funding Corporation

in the unpaid amount of Dollars (\$) \_\_\_\_\_ )

*Check one box only*

- ☐ Accepts the plan
- ☐ Rejects the plan

### *(Optional)* Plan Releases (Do not complete if you have rejected the Plan).

Pursuant to the Plan, if you return a Ballot and vote to ACCEPT the Plan, but do not elect to opt out of the release provision contained in Section 11.06(b) of the Plan, you are automatically deemed to have accepted the release provision contained in Section 11.06(b) of the Plan. However, if you vote to ACCEPT the Plan, you may check the box below to opt out of the release provision contained in Section 11.06(b) of the Plan.

☐ I hereby ELECT TO OPT OUT of the release provision contained in Section 11.06(b) of the Plan.

Section 11.06(b) of the Plan provides as follows:

**EXCEPT AS OTHERWISE PROVIDED IN THE PLAN OR THE CONFIRMATION ORDER, ON THE EFFECTIVE DATE, TO THE FULLEST EXTENT PERMISSIBLE UNDER APPLICABLE LAW, AS SUCH LAW MAY BE EXTENDED OR INTERPRETED SUBSEQUENT TO THE EFFECTIVE DATE, EACH HOLDER OF A CLAIM THAT DOES NOT VOTE TO REJECT THE PLAN AND ANY PERSON WHO RECEIVES A DISTRIBUTION UNDER THE PLAN, IN CONSIDERATION FOR THE OBLIGATIONS OF THE PLAN DEBTORS AND THE OTHER RELEASED PARTIES UNDER THE PLAN, THE PLAN DISTRIBUTIONS, AND OTHER RELEASES, AGREEMENTS OR DOCUMENTS EXECUTED AND DELIVERED IN CONNECTION WITH THE PLAN, WILL BE DEEMED TO CONSENSUALLY FOREVER RELEASE, WAIVE AND DISCHARGE ALL CLAIMS, DEMANDS, DEBTS, RIGHTS, CAUSES OF ACTION OR LIABILITIES (OTHER THAN THE RIGHT TO ENFORCE THE OBLIGATIONS OF ANY PARTY UNDER THE PLAN AND THE CONTRACTS, INSTRUMENTS, RELEASES, AGREEMENTS AND DOCUMENTS DELIVERED UNDER OR IN CONNECTION WITH THE PLAN, EXCEPT OBLIGATIONS TO BUTLER UNDER THE PURCHASE AGREEMENT), INCLUDING, WITHOUT LIMITATION, ANY CLAIMS FOR ANY SUCH LOSS SUCH HOLDER MAY SUFFER, HAVE SUFFERED OR BE ALLEGED TO SUFFER AS A RESULT OF THE PLAN DEBTORS COMMENCING THE CHAPTER 11 CASES OR AS A RESULT OF THE PLAN BEING CONSUMMATED, WHETHER LIQUIDATED**

**OR UNLIQUIDATED, FIXED OR CONTINGENT, MATURED OR UNMATURED, KNOWN OR UNKNOWN, FORESEEN OR UNFORESEEN, THEN EXISTING OR THEREAFTER ARISING, IN LAW, EQUITY OR OTHERWISE THAT ARE BASED IN WHOLE OR IN PART ON ANY ACT OR OMISSION, TRANSACTION, EVENT OR OTHER OCCURRENCE TAKING PLACE ON OR PRIOR TO THE EFFECTIVE DATE IN ANY WAY RELATING TO THE PLAN DEBTORS, THE CHAPTER 11 CASES, THE PLAN OR THE DISCLOSURE STATEMENT AGAINST ANY RELEASED PARTY (WHICH INCLUDES THE DEBTOR-RELEASED PARTIES, THE "THIRD PARTY RELEASE").**

**(i) In addition, Butler shall have no liability and shall be released from all claims asserted by Holders of Claims or Interests provided that the Plan Debtors and Reorganized Plan Debtors shall retain all rights and claims under the Purchase Agreement.**

Dated: \_\_\_\_\_

Print or type  
name: \_\_\_\_\_

Signature: \_\_\_\_\_ Title (if corporation or  
partnership) \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

---

Return this ballot to:

**Novation Companies, Inc., et al.  
c/o Shapiro Sher Guinot & Sandler  
Attn: Joel I. Sher  
250 West Pratt Street  
Suite 2000  
Baltimore, Maryland 21201**

**ANNEX 2**

**Classes 4a and 4b – Ballot of RMBS Litigation Claims  
Against Novation and NovaStar Mortgage**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(BALTIMORE DIVISION)**

In re: \* Chapter 11

NOVATION COMPANIES, INC., *et al.*,<sup>1</sup> \* Case No. 16-19745, 16-19747-49 (DER)

\* (Jointly Administered)

\*

Debtors.

\* \* \* \* \*

## **Class 4a & 4b Ballot for Accepting or Rejecting Plan of Reorganization**

---

The above captioned debtors and debtors in possession (the “Debtors”) filed a plan of reorganization dated February 14, 2017 (the *Plan*) for the Debtors in these cases. The Court has approved a disclosure statement with respect to the Plan (the *Disclosure Statement*). The Disclosure Statement provides information to assist you in deciding how to vote your ballot. If you do not have a Disclosure Statement, you may obtain a copy by writing Novation Companies, Inc., et al., c/o Shapiro Sher Guinot & Sandler, Attn: Joel I. Sher, 250 West Pratt Street, Suite 2000, Baltimore, Maryland 21201 or by email at jis@shapirosher.com, or by calling 410-385-4277 (the “Solicitation Agent”).

Court approval of the disclosure statement does not indicate approval of the Plan by the Court.

**You should review the Disclosure Statement and the Plan before you vote. You may wish to seek legal advice concerning the Plan and your classification and treatment under the Plan. Your claim has been placed in either Class 4a or 4b under the Plan. If you hold claims or equity interests in more than one class, you will receive a ballot for each class in which you are entitled to vote.**

**If your ballot is not received on or before [ ], 2017, by the Solicitation Agent at the address at the bottom of this Notice, and such deadline is not extended, your vote will not count as either an acceptance or rejection of the Plan.**

**If the Plan is confirmed by the Bankruptcy Court, it will be binding on you whether or not you vote.**

---

<sup>1</sup> The Debtors in these chapter 11 cases are: (i) Novation Companies, Inc. f/k/a NovaStar Financial, Inc., (ii) NovaStar Mortgage LLC f/k/a NovaStar Mortgage, Inc., (iii) NovaStar Mortgage Funding Corporation and (iv) 2114 Central, LLC f/k/a Advent Financial Services, LLC.



### Acceptance or Rejection of the Plan

The undersigned, the holder of a Class 3 claim against the Debtor

*Check one box only*

- ☐ Novation Companies, Inc.
- ☐ NovaStar Mortgage Funding Corporation

in the unpaid amount of Dollars (\$) \_\_\_\_\_ )

*Check one box only*

- ☐ Accepts the plan
- ☐ Rejects the plan

#### *(Optional)* Plan Releases (Do not complete if you have rejected the Plan).

Pursuant to the Plan, if you return a Ballot and vote to ACCEPT the Plan, but do not elect to opt out of the release provision contained in Section 11.06(b) of the Plan, you are automatically deemed to have accepted the release provision contained in Section 11.06(b) of the Plan. However, if you vote to ACCEPT the Plan, you may check the box below to opt out of the release provision contained in Section 11.06(b) of the Plan.

☐ I hereby ELECT TO OPT OUT of the release provision contained in Section 11.06(b) of the Plan.

Section 11.06(b) of the Plan provides as follows:

**EXCEPT AS OTHERWISE PROVIDED IN THE PLAN OR THE CONFIRMATION ORDER, ON THE EFFECTIVE DATE, TO THE FULLEST EXTENT PERMISSIBLE UNDER APPLICABLE LAW, AS SUCH LAW MAY BE EXTENDED OR INTERPRETED SUBSEQUENT TO THE EFFECTIVE DATE, EACH HOLDER OF A CLAIM THAT DOES NOT VOTE TO REJECT THE PLAN AND ANY PERSON WHO RECEIVES A DISTRIBUTION UNDER THE PLAN, IN CONSIDERATION FOR THE OBLIGATIONS OF THE PLAN DEBTORS AND THE OTHER RELEASED PARTIES UNDER THE PLAN, THE PLAN DISTRIBUTIONS, AND OTHER RELEASES, AGREEMENTS OR DOCUMENTS EXECUTED AND DELIVERED IN CONNECTION WITH THE PLAN, WILL BE DEEMED TO CONSENSUALLY FOREVER RELEASE, WAIVE AND DISCHARGE ALL CLAIMS, DEMANDS, DEBTS, RIGHTS, CAUSES OF ACTION OR LIABILITIES (OTHER THAN THE RIGHT TO ENFORCE THE OBLIGATIONS OF ANY PARTY UNDER THE PLAN AND THE CONTRACTS, INSTRUMENTS, RELEASES, AGREEMENTS AND DOCUMENTS DELIVERED UNDER OR IN CONNECTION WITH THE PLAN, EXCEPT OBLIGATIONS TO BUTLER UNDER THE PURCHASE AGREEMENT), INCLUDING, WITHOUT LIMITATION, ANY CLAIMS FOR ANY SUCH LOSS SUCH HOLDER MAY SUFFER, HAVE SUFFERED OR BE ALLEGED TO SUFFER AS A RESULT OF THE PLAN DEBTORS COMMENCING THE CHAPTER 11 CASES OR AS A RESULT OF THE PLAN BEING CONSUMMATED, WHETHER LIQUIDATED**

**OR UNLIQUIDATED, FIXED OR CONTINGENT, MATURED OR UNMATURED, KNOWN OR UNKNOWN, FORESEEN OR UNFORESEEN, THEN EXISTING OR THEREAFTER ARISING, IN LAW, EQUITY OR OTHERWISE THAT ARE BASED IN WHOLE OR IN PART ON ANY ACT OR OMISSION, TRANSACTION, EVENT OR OTHER OCCURRENCE TAKING PLACE ON OR PRIOR TO THE EFFECTIVE DATE IN ANY WAY RELATING TO THE PLAN DEBTORS, THE CHAPTER 11 CASES, THE PLAN OR THE DISCLOSURE STATEMENT AGAINST ANY RELEASED PARTY (WHICH INCLUDES THE DEBTOR-RELEASED PARTIES, THE "THIRD PARTY RELEASE").**

**(i) In addition, Butler shall have no liability and shall be released from all claims asserted by Holders of Claims or Interests provided that the Plan Debtors and Reorganized Plan Debtors shall retain all rights and claims under the Purchase Agreement.**

Dated: \_\_\_\_\_

Print or type  
name: \_\_\_\_\_

Signature: \_\_\_\_\_ Title (if corporation or  
partnership) \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

---

Return this ballot to:

**Novation Companies, Inc., et al.  
c/o Shapiro Sher Guinot & Sandler  
Attn: Joel I. Sher  
250 West Pratt Street  
Suite 2000  
Baltimore, Maryland 21201**

**ANNEX 3**

**Letter to Voting Classes**

**Novation Companies, Inc. and  
NovaStar Mortgage Funding Corporation**

[\_\_\_\_], 2017

Re: Solicitation of Votes to Accept or Reject the Proposed Joint Chapter 11 Plan of Reorganization of (I) Novation Companies, Inc. and (II) NovaStar Mortgage LLC

On February 15, 2017, Novation Companies, Inc. and NovaStar Mortgage Funding Corporation, as debtors and debtors in possession (the “*Debtors*”) filed the following documents with the United States Bankruptcy Court for the District of Maryland (the “*Bankruptcy Court*”):

- (a) Disclosure Statement Regarding Joint Chapter 11 Plan of Reorganization of (I) Novation Companies, Inc. and (II) NovaStar Mortgage LLC (the “*Disclosure Statement*”); and
- (b) Proposed Joint Chapter 11 Plan of Reorganization of (I) Novation Companies, Inc. and (II) NovaStar Mortgage LLC (the “*Plan*”).<sup>1</sup>

On [ ], 2017, the Bankruptcy Court entered an order approving the Disclosure Statement and an order approving certain procedures with respect to the solicitation of votes to accept or reject the Plan. A hearing on confirmation of the Plan is currently scheduled to commence on [\_\_\_\_], 2017. A supplement to the Plan and/or Disclosure Statement may be filed on or before ten days before the Confirmation Hearing.

**You have received this letter and the enclosed materials because you may be entitled to vote on the Plan.**

The enclosed materials constitute the Debtors’ “Solicitation Package” and consist of the following:

- (a) this cover letter;
- (b) the Plan;
- (c) the Disclosure Statement; and
- (b) the appropriate form of Ballot and instructions with respect thereto.

The Debtors have approved the filing and solicitation of the Plan. The Debtors believe that the acceptance of the Plan is in the best interests of the holders of Claims against and Interests in each of the Debtors. Moreover, the Debtors believe that any alternative other than confirmation of the Plan could result in extensive delays and increased administrative expenses,

---

<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Disclosure Statement, the Disclosure Statement Motion (as defined herein) or the Disclosure Statement Order (as defined herein), as applicable.

thereby resulting in smaller distributions or no distributions at all on account of Claims or Interests.

**THE DEBTORS THEREFORE RECOMMEND THAT ALL ENTITIES ENTITLED TO VOTE SUBMIT A TIMELY BALLOT VOTING TO ACCEPT THE PLAN.**

The materials in the Solicitation Package are intended to be self-explanatory. If you have any questions, however, please feel free to contact the Solicitation Agent by mail at Shapiro Sher Guinot & Sandler, 250 West Pratt Street, Suite 2000, Baltimore, Maryland 21201 (Attn: Joel I. Sher) or by phone at 410-385-4277.

Sincerely,

/s/ \_\_\_\_\_

Name:

Title:

**ANNEX 4**

**Notice of Non-Voting Status**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(BALTIMORE DIVISION)**

In re: \* Chapter 11  
**NOVATION COMPANIES, INC., et al.,**<sup>1</sup> \* Case No. 16-19745, 16-19747-49 (DER)  
\* (Jointly Administered)  
\*  
Debtors.  
\* \* \* \* \*

**NOTICE OF NON-VOTING STATUS WITH RESPECT TO UNCLASSIFIED  
CLAIMS AND UNIMPAIRED CLASSES DEEMED TO ACCEPT THE PLAN**

**PLEASE TAKE NOTICE** that:

On or about February 14, 2017, the Debtors filed (i) the Disclosure Statement Regarding Joint Chapter 11 Plan of Reorganization of (I) Novation Companies, Inc. and (II) NovaStar Mortgage LLC (the “Disclosure Statement”) and (ii) the Joint Chapter 11 Plan of Reorganization of (I) Novation Companies, Inc. and (II) NovaStar Mortgage LLC (the “Plan”).

On [ ], 2017, the Bankruptcy Court entered an order approving the Disclosure Statement and an order approving certain procedures with respect to the solicitation of votes to accept or reject the Plan and authorizing the Debtors to solicit votes to accept or reject the Plan. The Voting Deadline is \_\_\_\_\_.<sup>2</sup>

A hearing on confirmation of the Plan currently is scheduled to commence on [\_\_\_\_], 2017. A supplement to the Plan and/or Disclosure Statement may be filed on or before ten days before the Confirmation Hearing.

**You are receiving this notice because, under the terms of the Disclosure Statement Order, either: (i) your Claim(s) or Interest(s) is/are unclassified pursuant to Bankruptcy Code section 1123(a)(1) and, therefore, you are not entitled to vote on the Plan; (ii) your Claim(s) or Interest(s) against the Debtors is/are “unimpaired” and, therefore, in**

---

<sup>1</sup> The Debtors in these chapter 11 cases are: (i) Novation Companies, Inc. f/k/a NovaStar Financial, Inc., (ii) NovaStar Mortgage LLC f/k/a NovaStar Mortgage, Inc., (iii) NovaStar Mortgage Funding Corporation and (iv) 2114 Central, LLC f/k/a Advent Financial Services, LLC.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Disclosure Statement, the Disclosure Statement Motion or the Disclosure Statement Order, as applicable

**accordance with Bankruptcy Code section 1126(f), you are (a) deemed to have accepted the Plan and (b) not entitled to vote on the Plan.**

Based on the foregoing, you will not receive a complete Solicitation Package, and no ballot to vote to accept or reject the Plan is enclosed. Accordingly, this notice is being sent to you for informational purposes only. Parties may obtain copies of the Plan, the Disclosure Statement and other documents and materials included in the Solicitation Package (except Ballots) (i) from the Debtors' counsel as their Solicitation Agent, Shapiro Sher Guinot & Sandler, 250 West Pratt Street, Suite 2000, Baltimore, Maryland 21201 (Attn: Joel I. Sher) or by phone at 410-385-4277; or (ii) for a fee via PACER at <https://ecf.nysb.uscourts.gov>.

If you have any questions about the status of your Claim(s), you should contact the Solicitation Agent in accordance with the instructions provided above.

Date: April \_\_, 2017

/s/ Joel I. Sher

Joel I. Sher, Bar No. 00719  
SHAPIRO SHER GUINOT & SANDLER  
250 W. Pratt Street, Suite 2000  
Baltimore, Maryland 21201  
Tel: 410-385-4277  
Fax: 410-539-7611  
Email: [jis@shapirosher.com](mailto:jis@shapirosher.com)

and

/s/ Adam H. Friedman

Adam H. Friedman, admitted pro hac vice  
OLSHAN FROME WOLOSKY LLP  
1325 Avenue of the Americas  
New York, New York 10019  
Tel: 212-451-2216  
Fax: 212-451-2222  
Email: [AFriedman@olshanlaw.com](mailto:AFriedman@olshanlaw.com)

*Counsel to the Debtors and Debtors in Possession*



**ANNEX 5**

**Confirmation Hearing Notice**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(BALTIMORE DIVISION)**

In re: \* Chapter 11  
**NOVATION COMPANIES, INC., et al.,**<sup>1</sup> \* Case No. 16-19745, 16-19747-49 (DER)  
\* (Jointly Administered)  
\*

Debtors.

\* \* \* \* \*

**NOTICE OF ENTRY OF ORDER (I) APPROVING DISCLOSURE STATEMENT  
(II) APPROVING SOLICITATION AND NOTICE MATERIALS; (III) APPROVING  
FORMS OF BALLOTS; (IV) ESTABLISHING SOLICITATION AND VOTING  
PROCEDURES; (V) ESTABLISHING PROCEDURES FOR ALLOWING AND  
ESTIMATING CERTAIN CLAIMS FOR VOTING PURPOSES; (VI)  
SCHEDULING A CONFIRMATION HEARING AND (VII)  
ESTABLISHING NOTICE AND OBJECTION PROCEDURES**

**PLEASE TAKE NOTICE** that:

1. On [\_\_\_\_], 2017, the United States Bankruptcy Court for the District of Maryland (the “Bankruptcy Court”) entered an order (the “Disclosure Statement Order”) that, among other things, (i) approved the Debtors’ Disclosure Statement Regarding Joint Chapter 11 Plan of Reorganization of (I) Novation Companies, Inc. and (II) NovaStar Mortgage LLC (the “Disclosure Statement”) filed in support of the Joint Chapter 11 Plan of Reorganization of (I) Novation Companies, Inc. and (II) NovaStar Mortgage LLC (the “Plan”) as containing “adequate information” as required under section 1125(a) of title 11 of the United States Code (the “Bankruptcy Code”), and (ii) authorized the Debtors to solicit votes to accept or reject the Plan.
2. The Disclosure Statement Order establishes April 6, 2017 as the Voting Record Date<sup>2</sup> for determining which holders of Claims against the Debtors are entitled to vote on the Plan. The Bankruptcy Court also entered an order that establishes [\_\_\_\_], 2017 as the Voting Deadline for the submission of ballots to accept or reject the Plan.

---

<sup>1</sup> The Debtors in these chapter 11 cases are: (i) Novation Companies, Inc. f/k/a NovaStar Financial, Inc., (ii) NovaStar Mortgage LLC f/k/a NovaStar Mortgage, Inc., (iii) NovaStar Mortgage Funding Corporation and (iv) 2114 Central, LLC f/k/a Advent Financial Services, LLC.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Disclosure Statement, the Motion or the Disclosure Statement Order, as applicable.

3. If you hold a Claim in Classes 3a, 3b, 4a and/or 4b as of the Voting Record Date and are entitled to vote to accept or reject the Plan, you have received copies of (i) the Disclosure Statement Order, the Disclosure Statement, the Plan and certain exhibits thereto, (ii) this notice, and (iii) a Ballot, together with a pre-addressed envelope, to be used by you in voting to accept or to reject the Plan. Failure to follow the instructions set forth on the Ballot, may disqualify that Ballot and the vote represented thereby.
4. Holders of (i) Unimpaired Claims or Interests and (ii) Claims or Interests that are not entitled to vote on the Plan, will receive a Notice of Non-Voting Status rather than a Ballot. If you have not received a Ballot but believe that you should be entitled to vote on the Plan, then you must serve on the Debtors and file with the Bankruptcy Court a motion for an order pursuant to Bankruptcy Rule 3018(a) (a “Rule 3018(a) Motion”) temporarily allowing such claim in a different amount for purposes of voting to accept or reject the Plan on or before the fourteenth (14th) day after the later of (i) the date that the Debtors complete distribution of the Solicitation Packages and (ii) the date of service of an objection, if any, to such claim. In accordance with Bankruptcy Rule 3018, as to any creditor filing a Rule 3018(a) Motion, such creditors Ballot will not be counted unless temporarily allowed by the Bankruptcy Court for voting purposes after notice and a hearing. Rule 3018(a) Motions that are not timely filed and served in the manner as set forth above may not be considered.
5. THE PLAN CONTAINS AN INJUNCTION THAT PREVENTS, AMONG OTHER THINGS, ALL ENTITIES WHO HAVE HELD, HOLD OR MAY HOLD ANY CLAIMS, INTERESTS, CAUSES OF ACTION OR LIABILITIES THAT HAVE BEEN RELEASED OR ARE SUBJECT TO EXCULPATION UNDER THE PLAN (THE “**ENJOINED CAUSES OF ACTION**”), FROM AND AFTER THE EFFECTIVE DATE, FROM COMMENCING OR CONTINUING, IN ANY MANNER, ANY ENJOINED CAUSES OF ACTION AGAINST, AS APPLICABLE, ANY RELEASED PARTY OR EXCULPATED PARTY.
6. A hearing to confirm the Plan (the “**Confirmation Hearing**”) will commence on [\_\_\_], **2017 at \_\_:00 .m. (prevailing Eastern time)** before the Honorable David E. Rice, United States Bankruptcy Judge, 101 W Lombard St., Room 8530, Baltimore, MD 21201. The Confirmation Hearing may be continued from time to time without further notice other than an announcement of the adjournment in open court or a notice of adjournment filed with the Court and served on the Noticed Parties and the entities who have filed objections to the Plan, without further notice to other parties in interest. In accordance with the Plan, the Plan may be modified, if necessary, prior to, during or as a result of the Confirmation Hearing, without further notice to interested parties.
7. The Bankruptcy Court has established [\_\_\_\_\_], **at 4:00 p.m. (prevailing Eastern time)** as the last date and time for filing and serving objections to the confirmation of the Plan (the “**Plan Objection Deadline**”). Any objection to the Plan must (i) be in writing, (ii) conform to the Bankruptcy Rules and the Local Bankruptcy Rules, (iii) state the name and address of the objecting party and the amount and nature of the claim or interest of such entity, (iv) state with particularity the basis and nature of any objection to the Plan and, if practicable, a proposed modification to the Plan that would

resolve such objection and (v) be filed, contemporaneously with a proof of service, with the Bankruptcy Court and served so that it is actually received no later than the Plan Objection Deadline by: (a) counsel for the Debtors, (i) Olshan Frome Wolosky LLP, 1325 Avenue of the Americas, New York, New York 10019 (Attn.: Adam H. Friedman Esq.) and (ii) Shapiro Sher Guinot & Sandler, 250 West Pratt Street, Suite 2000, Baltimore, Maryland 21201 (Attn: Joel I. Sher, Esq.); (b) the Office of the United States Trustee for the District of Maryland, 101 W. Lombard Street, Suite 2625, Baltimore, MD 21201, Attn: Gerard Vetter, Esq. and Katherine A. Levin, Esq., and (c) all parties having filed a notice of appearance in these cases.

**UNLESS AN OBJECTION IS TIMELY FILED AND SERVED AS PROVIDED  
HEREIN, IT MAY NOT BE CONSIDERED AT THE CONFIRMATION  
HEARING.**

Date: April\_\_, 2017

/s/ Joel I. Sher

Joel I. Sher, Bar No. 00719  
SHAPIRO SHER GUINOT & SANDLER  
250 W. Pratt Street, Suite 2000  
Baltimore, Maryland 21201  
Tel: 410-385-4277  
Fax: 410-539-7611  
Email: [jis@shapirosher.com](mailto:jis@shapirosher.com)

and

/s/ Adam H. Friedman

Adam H. Friedman, admitted *pro hac vice*  
OLSHAN FROME WOLOSKY LLP  
1325 Avenue of the Americas  
New York, New York 10019  
Tel: 212-451-2216  
Fax: 212-451-2222  
Email: [AFriedman@olshanlaw.com](mailto:AFriedman@olshanlaw.com)

*Counsel to the Debtors and Debtors in  
Possession*